

Remarks

This paper is a response to a non-final Office action electronically delivered April 20, 2007. The response is being filed within the three month shortened statutory period for reply set forth in the action.

In that action, claims 1-7 and 9-13 were rejected under 35 U.S.C. 102 as being anticipated by U.S. Patent Application Publication 2006/0143200 – Powlette (hereinafter Powlette). While all of the original claims are being canceled, the rejection will be discussed as if it had been made against one of more of the newly added claims.

It is submitted that the rejection is improper and should be withdrawn.

It is well established law that a reference anticipates a claim only if the reference teaches every element recited in the claim. Powlette falls far short of doing that.

As indicated in several places in the Powlette specification, the reason for the Powlette invention is a need to circumvent a Java technology security practice that prevents locally-generated data from being sent to local resources (such as a printer) without imposing similar access restrictions on data received from a remote system. Powlette's circumvention is to send the locally-generated data to a remote system, preferably using a standard image format such as a GIF or a JPEG file. When the data is then retrieved from the remote system, it is treated as remotely-generated data in the local system and (according to Powlette) can be sent to local resources, such as a printer. Nothing was found in the Powlette specification that indicated that the remote server played any role in the creation of data generated at the local system or served any purpose other than to be a "backboard" from which the data sent by the local system could be bounced back to the local system.

Powlette mentions only two systems - the local system in which the data is initially generated and the remote (backboard) system which bounces data originating in the local system back to the local system.

Applicants' invention, on the other hand, involves three systems: a remote server system that is the source of data to be processed, a local system that retrieves the data from the remote system through a web browser running in the local system, and a web application server connected only to the local system for processing print requests generated by the local system. The web application server receives printing information from the local system, processes that information to generate a printable file (preferably using a standard print format such as the Portable Document Format (PDF) format and returns the printable file to the local system for transfer to a printer subsystem.

Powlette neither discloses nor suggests the use of a client-connected web application server that can be used to process client-originated print requests based on execution of a program received from a remote server and returning a printable file to the client.

In fact, Powlette would have no use for such a web application server in his system. As noted in paragraph [0016] of the Powlette specification, the locally generated data is "preferably used to compress the file data into a standard file format readable by the browser system" in order to "transfer the modified file data from the local computing system to the remote system". In other words, the local system performs the necessary print preparation before it ever sends the file to the remote system in preparation for having the same data bounced back from the remote system.

It is submitted that Powlette neither discloses nor suggests the use of a client-connected web application server for performing print preparation tasks. Any 102 rejection based on the Powlette teachings is improper.

Claim 8 was rejected under 35 U.S.C. 103 over a proposed combination of Powlette and 6,779,178 – Lloyd et al (hereafter Lloyd). Claim 8 has been canceled, technically rendering the rejection moot. The rejection will be discussed as if it had been made against one or more of the newly added claims.

The Lloyd patent is cited specifically for teaching that PDF-formatted files can be used to transfer printer-independent information over the Internet. Even if it is stipulated that the Lloyd patent contains such a teaching, a rejection based on the hypothetical combination of Powlette and Lloyd would still be improper as neither reference teaches the use of a web application server to provide printer-preparation tasks for a logically attached client.

It is respectfully requested that subject application be passed to issue containing newly added claims 14-23.

Respectfully Submitted,

/Gerald R. Woods/

Gerald R. Woods, Reg. No. 24,144

(919) 554-0993